

STRAFFI & STRAFFI, LLC

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Attorney for Debtor(s)

In re:) UNITED STATES BANKRUPTCY COURT
) FOR THE DISTRICT OF NEW JERSEY
)
) Chapte3123 proceeding
Jones, Kimberly) Case No. 16-22234/CMG
)
) NOTICE OF MOTION FOR ORDER
) CONVERTING CASE FROM CHAPTER 13
) TO CHAPTER11 BANKRUPTCY
Debtor(s).)
)
) Hearing Date: August 2, 2018 @ 11:00 am
) ORAL ARGUMENT WAIVED

To: All parties on mailing list annexed hereto.

PLEASE TAKE NOTICE that Daniel E. Straffi, Jr., Esq., attorney for Debtor, Kimberly Jones shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Court, 50 Walnut Street, Courtroom 3B, Newark, New Jersey, on August 2, 2018 at 11:00 a.m. or at such sooner time as the Court may direct, for the entry of an Order to Convert to Chapter 11 Bankruptcy;

PLEASE TAKE FURTHER NOTICE that the movant shall rely upon the attached Certification. No brief is submitted since no unique question of law exists;

PLEASE TAKE FURTHER NOTICE that if any party in interest objects to the within Motion, a written objection must be filed with the Clerk of the United States Bankruptcy Court, United States Courthouse, MLK Jr Federal Building, 50 Walnut Street, Newark, New

Jersey 07102, with a copy of any such objection to be served on the undersigned. All such objections must be filed not later than seven (7) days before the above hearing date or such other time as the Court may direct;

PLEASE TAKE FURTHER NOTICE that the undersigned waives oral argument; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is enclosed.

Dated: July 3, 2018

/s/ Daniel E. Straffi, Jr.

Daniel E. Straffi, Jr.

MAILING LIST

US Trustee's Office
One Newark Center
Suite 2100
Newark, NJ 07102

Marie -Ann Greenberg
Standing Chapter 13 Trustee
30 Two Bridges Road
Suite 330
Fairfield, NJ 07004
(Chapter 13 Trustee)

Kimberly Jones
c/o DDK & Company
1 Penn Plaza, Suite 440
New York, NY 10119-0499
(Debtor)

Rushmore Loan Management
15480 Laguna Canyon
Irvine, CA 92618-2132
Attn: Officer, Managing or General Agent
(Secured Creditor)

Parker, McCay, P.A.
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(Attorney for Rushmore Loan Management)